

**Coleman, Charles**

---

**From:** Emilsson, Gunnar <EmilssonGR@cdmsmith.com>  
**Sent:** Friday, September 11, 2015 10:07 AM  
**To:** Brockman, Kenneth  
**Cc:** Coleman, Charles; Joel Chavez (Jchavez@mt.gov)  
**Subject:** RE: Opportunity area ISWP comments  
**Attachments:** Opportunity Area Residential ISWP comments.docx

Sounds good to me. I have made Ken's edits.

**From:** Brockman, Kenneth [mailto:kbrockman@usbr.gov]  
**Sent:** Friday, September 11, 2015 10:02 AM  
**To:** Emilsson, Gunnar  
**Cc:** Coleman, Charles (COleman.Charles@epa.gov); Joel Chavez (Jchavez@mt.gov)  
**Subject:** Re: Opportunity area ISWP comments

All,

A couple of comments:

3rd paragraph, for clarification, I would suggest "where the area-weighted average arsenic concentration or component lead concentration"

Comment 2 - I think we can delete this comment. Upon further research I noted that the RAWP Section 5.7.1 states that the Sample Location Maps will be included in the annual DSRs. I checked the 2012 and 2013 DSR and these maps are included in Appendix D. This takes care of my current concern and should be workable in the future. If we need maps before the annual DSR is submitted it will be easy for Agency oversight to get these from AR.

With these clarifications we can send Gunnar's comments to AR without any specific comments from me.

Ken

On Thu, Sep 10, 2015 at 3:40 PM, Emilsson, Gunnar <EmilssonGR@cdmsmith.com> wrote:

Charlie, Joel, and Ken:

Per yesterday's discussion, attached are comments to the Opportunity Individual Site Work Plans, dated August 28, 2015.

I am also attaching Dennis Neuman's reviews of the DSRs that were conducted in 2013. I cannot find any record in my files of Charlie approving those DSRs. The reviews were completed right before the U.S. government shut down at the end of September 2013, so that may have slipped through the cracks. The above comments are structured to include the DSR reviews as an attachment.

**Gunnar Emilsson, P.G., P.E., BCEE**

Project Manager

CDM Smith

50 West 14th St., Suite 200, Helena, MT 59601

T: (406) 441-1422 F: (406) 449-7725 M: (406) 431-3982

[emilssongr@cdmsmith.com](mailto:emilssongr@cdmsmith.com)

[cdmsmith.com](http://cdmsmith.com)

**Comments to the Opportunity Area Individual Site Work Plans  
Community Soils Operable Unit, Anaconda Smelter NPL Site  
Prepared for Atlantic Richfield Company by Pioneer Technical Services, Inc.  
August 28, 2015**

General Comments

The Individual Site Work Plans (ISWPs) were submitted to the U.S. Environmental Protection Agency (EPA) by the Atlantic Richfield Company (Atlantic Richfield) as a result of sampling conducted by Atlantic Richfield in response to litigation being pursued by a group of landowners in the community of Opportunity. This sampling was conducted without EPA oversight or approved Sampling and Analysis Plans (SAPs). In 2013, Atlantic Richfield submitted two data validation summary reports documenting the SAP, analytical laboratory data, and data validation activities:

- Data Validation Summary Report, Opportunity Residential Soils Sampling Results, Anaconda Smelter NPL Site. Prepared by Portage Inc., for Pioneer Technical Services, Anaconda, MT. October 2012
- Data Validation Summary Report, Opportunity Residential Soils Sampling Results, Anaconda Smelter NPL Site. Prepared by Portage Inc., for Pioneer Technical Services, Anaconda, MT. June 2013

EPA and DEQ completed reviews (attached) of these data validation summary reports and found the data to be of enforcement quality.

The Residential ISWPs consist of twenty-seven (27) residential properties where the area-weighted average arsenic concentration or component lead concentration in one of the 4 depth increments (0 to 2, 2 to 6, 5 to 12, and 12 to 18 inches) in the top 18 inches were determined to be greater than the residential cleanup action level (250 mg/kg arsenic and 400 mg/kg lead). The logic used in selecting the remedies proposed in the ISWPs is in accordance with the recently *approved Final Community Soils OU Residential Soils/Dust Remedial Action Work Plan/Final Design Report* dated August 7, 2015. As such these ISWPs can be approved with the following comment:

1. The design drawings continue to use the 125 foot circular radius from the centroid of the residence to demark the maximum extent of remediation. As was discussed in previous technical meetings, and agreed to by Atlantic Richfield, it makes more sense to base remediation units on the actual yard component, especially in the community of Opportunity where residential lots are reasonably well defined. Use of the 125 foot radius should be limited to true rural settings where yard components are not defined, such as a cabin surrounded by native vegetation with no lawn. The remedial units should be determined through the initial pre-construction walkthrough with the Agencies prior to construction.

End of comments.